

277 Broadway, Suite 1501 New York, NY 10007

1825 Foster Avenue, Suite 1K Brooklyn, NY 11230 Gideon@GideonLaw.com*
GideonLaw.com

Office: (718) 783-3682 Signal: (646) 263-3495 Fax: (646) 349-2914*

*Not for service

May 5, 2025

BY ECF

Hon. Jennifer L. Rochon, U.S.D.J. United States District Court, Southern District of New York Daniel Patrick Moynihan Courthouse, 500 Pearl Street New York, New York 10007

Re: Guerrero-Tabares v. City of New York, et. al., 24-cv-6361 (JLR)

Your Honor:

I write jointly on behalf of all parties to inform the Court that, on April 29, 2025, the Defendants made an Offer of Judgment pursuant to Fed.R.Civ.P. 68 in this matter, which Plaintiff accepted on May 5, 2025.

Plaintiff will file the proof of acceptance and proof of acceptance, as well as the proposed judgment, shortly. If the Court sets a deadline, Plaintiff asks for a week, or until May 12, 2025, within which to do so.

Beyond that, the parties jointly ask that the Court extend the deadline by which Plaintiff must file any application for attorney's fees, costs, and expenses, until 90 days after the Court has entered that judgement, so that the parties can attempt to resolve the remaining claims for attorney's fees, costs, and expenses without the need for intervention by the Court.

The parties thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver

Plaintiff is directed to file the proof of acceptance and the proposed judgment by **May 12**, **2025**. The deadline by which Plaintiff shall file any application for attorney's fees, costs, and expenses is extended to 90 days after the Court enters judgment in this matter. The initial pretrial conference scheduled for May 13, 2025, is adjourned sine die, as are the associated deadlines. **SO ORDERED.**

Date: May 6, 2025

New York, New York

JENNIFER L. ROCHON United States District Judge